

# EXHIBIT 8

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

AMERICAN PROGRAM BUREAU, INC.,

*Plaintiff,*

v.

UNITED STATES OF AMERICA,

*Defendant.*

UNITED STATES OF AMERICA

*Plaintiff,*

v.

EDWARD SNOWDEN,

*Defendant.*

Case No. 1:20-mc-91250

This Document Relates To:  
Civil Action No. 1:19-cv-01197-LO-TCB  
in the United States District Court for the  
Eastern District of Virginia

**DECLARATION OF ROBERT P. WALKER**

I, ROBERT P. WALKER, being over the age of eighteen years and otherwise competent to make this declaration, declare that the following is based on my personal knowledge and is true and correct:

1. I am the President and Chief Executive Officer of American Program Bureau, Inc., a corporation organized under the laws of the Commonwealth of Massachusetts with its principal offices located at One Gateway Center, Suite 751, Newton, MA 02458 (“APB”).
2. Attached to this Declaration is a spreadsheet, consisting of three (3) pages under the caption “Edward Snowden Speaking Engagements 2015 – 2020” (the “ES Spreadsheet”) that

was prepared by the Vice President and Controller of APB who reports directly to me as President and Chief Executive Officer.

3. In my capacity as Chief Executive Officer of APB, I am responsible for and familiar with the accounting and financial activity of APB and for the books and records maintained by the company in the ordinary course of business.

4. The ES Spreadsheet reflects a total of sixty-seven (67) individual speaking engagements booked by APB directly, or through its affiliate Open Mic Management, for Edward Snowden between September 16, 2015 and May 19, 2020 which constitute all of such engagements booked for Edward Snowden by or through APB (including through Open Mic Management).

5. With respect to each speaking engagement, the ES Spreadsheet provides (a) the date of the engagement, (b) the name of the party responsible for the engagement (the "APB Client"), (c) the amount paid to APB or Open Mic Management pursuant to the contract executed for each engagement, (d) the "speaker honorarium" reflecting the amount payable to Edward Snowden, (e) the commission payable to APB or Open Mic Management and (f) the geographic location of each engagement.

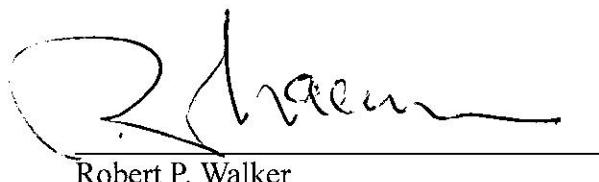
6. Each of the entries on the ES Spreadsheet were made at or near the time of the event or activity reflected therein.

7. The ES Spreadsheet and all entries reflected therein were made by – or from information transmitted by – myself or another employee of APB working under my supervision with personal knowledge of the content thereof and who reported such knowledge in the ordinary course of business.

8. The ES Spreadsheet and all entries reflected therein are of the kind routinely made and kept in the regular course of business by APB.

9. The ES Spreadsheet and all entries reflected therein were in the regular course of business activity by APB.

10. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



A handwritten signature in black ink, appearing to read "Robert P. Walker". The signature is fluid and cursive, with a large, stylized 'R' at the beginning. It is positioned above a solid horizontal line.

Robert P. Walker

Dated this 25 day of June, 2020.

EDWARD SNOWDEN SPEAKING ENGAGEMENTS 2015-2020

This horizontal timeline bar chart displays a series of events, each represented by a black bar indicating the duration of the event. The x-axis represents time, with major ticks at 08/22/17, 09/09/17, 09/11/17, 09/16/17, 10/06/17, 10/24/17, 11/08/17, 11/13/17, 11/21/17, 01/29/18, 03/02/18, 03/14/18, 03/15/18, 03/16/18, 03/27/18, 08/22/18, 09/12/18, 10/24/18, 11/06/18, 11/08/18, 11/29/18, 03/19/19, 05/15/19, 06/26/19, 08/20/19, 09/11/19, 09/12/19, 11/29/19, 12/02/19, 01/27/20, and 05/19/20. The y-axis lists the locations corresponding to these events: Edmonton AB, Indianapolis IN, Philadelphia PA, St. Louis MO, Stockholm, Dublin, San Francisco CA, Hamburg, Istanbul, New Orleans LA, Berlin, Sydney, Rust, Rottach-Egern, Camrose AB, Sao Paulo, Chicago IL, Dublin, Tel Aviv, Austin TX, London, London, Las Vegas NV, San Francisco CA, Berlin, Columbus OH, Columbus OH, California, Toronto ON, Ecublens, and Cologne.

Date	Location	Region
08/22/17	69477	
09/09/17	67842	
09/11/17	69286	
09/16/17	68304	
10/06/17	67378	
10/24/17	70127	
11/08/17	69839	
11/13/17	69007	
11/21/17	70290	
01/29/18	70692	
03/02/18	70182	
03/14/18	68812	
03/15/18	71528	
03/16/18	70331	
03/27/18	70122	
08/22/18	71660	
09/12/18	70797	
10/24/18	70139	
11/06/18	72172	
11/08/18	70701	
11/29/18	73019	
03/19/19	73047	
05/15/19	72973	
06/26/19	74636	
08/20/19	74728	
09/11/19	73332	
09/12/19	73425	
11/29/19	76106	
12/02/19	74197	
01/27/20	76220	
05/19/20	77113	
	Edmonton	AB
	Indianapolis	IN
	Philadelphia	PA
	St. Louis	MO
	Stockholm	
	Dublin	
	San Francisco	CA
	Hamburg	
	Istanbul	
	New Orleans	LA
	Berlin	
	Sydney	
	Rust	
	Rottach-Egern	
	Camrose	AB
	Sao Paulo	
	Chicago	IL
	Dublin	
	Tel Aviv	
	Austin	TX
	London	
	London	
	Las Vegas	NV
	San Francisco	CA
	Berlin	
	Columbus	OH
	Columbus	OH
	California	
	Toronto	ON
	Ecublens	
	Cologne	

A variance in the amount of \$185,200 exists with respect to the aggregate value of the income reported on the Forms 1099 issued to Mr. Snowden for the relevant reporting periods plus the honoraria for 2020, and the sum of the total reported speaker honoraria. APB cannot locate in its records a Form 1099 issued to Mr. Snowden for 2015. Additionally, an internal APB email attachment indicates that a contribution to the Freedom of the Press Foundation made at the request of Mr. Snowden before November 2017 accounts for \$35,000 of this variance. Together the honoraria reportedly earned in 2015 (\$134,000) and the \$35,000 contribution account for \$169,000 of the variance. The remaining \$16,200 is believed to also have been distributed as one or more charitable contributions at Mr. Snowden's request, although documentation to support that conclusion cannot be located. This spreadsheet was prepared by the Vice President and Controller of American Program Bureau, Inc.